

## Morse, Bob

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**From:** Olsen, Marian  
**Sent:** Tuesday, April 12, 2016 4:58 PM  
**To:** Morse, Bob  
**Cc:** Metz, Chloe  
**Subject:** RE: AF RESPONSE TO COMMENTS: (PFCs) Release Determination – Site Investigation Report (Site FT-030P) - Former Griffiss Air Force Base

Hi Bob,

I spoke with Chloe and her recommendation is that we continue to use the dermal absorption factor in the calculation of the soil screening level to be overly conservative and protective at this point.

Therefore, we can approve the document with the consideration that they need to update the exposure factors from the 2012 screening levels that they developed.

Thanks.

Marian

-----Original Message-----

From: Morse, Bob  
Sent: Tuesday, April 12, 2016 4:29 PM  
To: Olsen, Marian <Olsen.Marian@epa.gov>  
Subject: RE: AF RESPONSE TO COMMENTS: (PFCs) Release Determination – Site Investigation Report (Site FT-030P) - Former Griffiss Air Force Base

Ok thanks marian!

-----Original Message-----

From: Olsen, Marian  
Sent: Tuesday, April 12, 2016 4:23 PM  
To: Morse, Bob <Morse.Bob@epa.gov>; Pocze, Doug <Pocze.Doug@epa.gov>  
Subject: RE: AF RESPONSE TO COMMENTS: (PFCs) Release Determination – Site Investigation Report (Site FT-030P) - Former Griffiss Air Force Base

Hi Bob,

My recommendation is that we indicate to the AF that we will need to address the issue of PFOA/PFAS in the RI. Currently, the RAIS calculator is not providing a calculated value for PFOS and the value for PFOA does not match their previous calculation. Currently, the OW is finalizing their toxicity assessment and there are still questions regarding how to address dermal exposures.

Thanks.

Marian

-----Original Message-----

From: Morse, Bob  
Sent: Tuesday, April 12, 2016 3:22 PM  
To: Pocze, Doug <Pocze.Doug@epa.gov>; Olsen, Marian <Olsen.Marian@epa.gov>  
Subject: RE: AF RESPONSE TO COMMENTS: (PFCs) Release Determination – Site Investigation Report (Site FT-030P) - Former Griffiss Air Force Base

Below are the other 2 emails we exchanged. One is from Doug.

Bob

-----Original Message-----

From: Pocze, Doug  
Sent: Sunday, March 27, 2016 9:19 AM  
To: Morse, Bob <Morse.Bob@epa.gov>; Olsen, Marian <Olsen.Marian@epa.gov>  
Cc: Metz, Chloe <Metz.Chloe@epa.gov>  
Subject: RE: AF RESPONSE TO COMMENTS: (PFCs) Release Determination – Site Investigation Report (Site FT-030P) - Former Griffiss Air Force Base

Bob,

It does seem that the AF is responding adequately to the comments. Of course Marian/Chloe have to concur that the responses are sufficient.

However, as the AF indicates this is an SI and not an RI so some of the items will not be addressed until the RI.

doug

-----Original Message-----

From: Morse, Bob  
Sent: Wednesday, March 23, 2016 2:20 PM  
To: Olsen, Marian <Olsen.Marian@epa.gov>  
Cc: Pocze, Doug <Pocze.Doug@epa.gov>; Metz, Chloe <Metz.Chloe@epa.gov>  
Subject: FW: AF RESPONSE TO COMMENTS: (PFCs) Release Determination – Site Investigation Report (Site FT-030P) - Former Griffiss Air Force Base

Hi Marian,

I took a look at the attached AF Response to Comments, and it appears to me that the AF RTCs are adequate. We have some other documents coming so I wanted to spare you review of the RTC.

However, you had asked about the AF basis for RSLs for dermal contact, as the calculated #s were lower than ours. The AF says it's from their 2102 interim guidance and they attached a table with the #s. So you may want to take a quick look at their response (page 2 of RTC) and the attached table (in pdf or excel) just in case.

If you have any issues with them, or the RTC, please let me know. Otherwise I'd like to tell the AF ok to finalize the SI Report for FT-030 (their fire training area), as it will be going on to the RI stage.

The attached RTC has both our original comments (November) and the 3 comments I sent to them in February in response to their original RTC. Those 3 comments are highlighted in bold so they are easy to find. No need to look at the rest of our original comments.

Please let me know if any questions or issues. Thank you!

Bob

-----Original Message-----

From: FARNSWORTH, DAVID S GS-13 USAF HAF AFCEC/CIBE [mailto:david.farnsworth@us.af.mil]

Sent: Wednesday, March 23, 2016 11:01 AM

To: Morse, Bob <Morse.Bob@epa.gov>

Cc: Bishop, Heather L (DEC) <heather.bishop@dec.ny.gov>; Pocze, Doug <Pocze.Doug@epa.gov>; CLAXTON, BILLY W GS-13 USAF HAF AFCEC/CIBE <billy.claxton@us.af.mil>; Baker, Peter S. (peter.baker@amecfw.com) <peter.baker@amecfw.com>; Helton, Melissa C (melissa.helton@amecfw.com) <melissa.helton@amecfw.com>; sdeldredge@gmail.com; Brad Juneau <Brad.Juneau@cn-bus.com>

Subject: RE: AF RESPONSE TO COMMENTS: (PFCs) Release Determination – Site Investigation Report (Site FT-030P) - Former Griffiss Air Force Base

Bob,

Attached is a revised set of Response to USEPA comments on the Draft Griffiss (FTA/FT030) PFC SI Report. The revised responses include requested clarifications to comments #1, 7, and 8. Also attached, in both "xml" and "pdf" format are the soil RSL calculations that were requested.

Let us know ASAP if this addresses USEPA's comments, and if EPA concurs with Finalizing the Griffiss SI report; the Air Force can submit a Draft Final Report if needed.

Dave

//Signed//

David S. Farnsworth, GS-13, DAF

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-----Original Message-----

From: Morse, Bob [mailto:Morse.Bob@epa.gov]

Sent: Wednesday, February 03, 2016 4:57 PM

To: FARNSWORTH, DAVID S GS-13 USAF HAF AFCEC/CIBE

Cc: Bishop, Heather L (DEC); Pocze, Doug

Subject: FW: AF RESPONSE TO COMMENTS: (PFCs) Release Determination - Site Investigation Report (Site FT-030P) - Former Griffiss Air Force Base

Dave,

EPA has reviewed the response to comments. Based on this review, we have the following comments, which are essentially a request for clarification.

Comment # 1 - Executive Summary

The AF developed a remediation goal that includes dermal contact. We have not been able to locate any AF documents that explain this calculation or the source of toxicity information for dermal exposure. We request that the AF provide the basis for this calculation, since the calculated numbers provided in the response are lower than those currently used by the EPA Superfund Program.

Comment #7. - Development of Risk Assessment

As a point of clarification, the text indicates that a baseline risk assessment may not be needed. It would be helpful to clarify the decision making process to determine the need for a risk assessment.

Comment #8. - Trespasser

If a risk assessment is developed for this area, the trespasser will need to be evaluated in the baseline human health risk assessment. The risk assessment evaluates risks in the absence of institutional controls such as the fence mentioned in the response and remedial action. This is an issue that will need to be addressed in the baseline risk assessment.

Please let me know if you have any questions. Thanks.

Bob